



February 22, 2013

Office of Waste Programs Enforcement  
RCRA Enforcement Division (OS-520)  
United States Environmental Protection Agency  
Ariel Rios Building (5101)  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004

Dear Sir:

Subject: 2012 Hazardous Waste Export Report (EPA ID # NYR000184986)

Enclosed is the USEPA Annual Report of Hazardous Waste Exports for Rochester Silver Works, LLC facility located within Eastman Business Park. This submission covers exports of hazardous waste made during the calendar year 2012. It is noted that there was only one shipment exported in the 2012 reporting year. Rochester Silver Works has since begun using a precious metals recycling facility within the United States.

Any questions and correspondence relative to this request should be directed to:

Gary R. Winburn  
Rochester Silver Works, LLC  
P.O. Box 15397  
Rochester, New York 14615-5397  
Telephone: (585) 743-1622  
Fax: (585) 743-1682  
Email: GWinburn@rochestersilverworks.com

Sincerely,

A handwritten signature in blue ink that reads 'Gary R. Winburn' followed by the date '2/22/13'.

Gary R. Winburn  
Building Manager, Maintenance Supervisor, HSE Champion  
Rochester Silver Works, LLC

attachment



**ANNUAL REPORT OF HAZARDOUS WASTE EXPORTS FOR 2012**

**1. Legal Name and Mailing Address:**

**Name:** Rochester Silver Works, LLC  
**EPA ID:** NYR000184986  
**Mailing Address:** P.O. Box 15397  
Rochester, New York 14652-5397

**2. Date and State of Incorporation:**

10/01/2011  
New York

**3. Name and Address of the Registered Agent:**

Rochester Silver Works, LLC  
P.O. Box 15397  
Rochester, New York 14652-5397

**4. Name and Mailing Address of Each Foreign Facility to which Eastman Kodak Company Exported Hazardous Waste During the 2012 Calendar Year:**

**CONSIGNEE #1**

**Name:** Xstrata Canada Corporation  
**EPA ID:** FC0CANADA004  
**Address:** Brunswick Smelter  
692 Main Street  
Belledune, New Brunswick  
Canada, E8G 2M1

**TRANSPORTER #1**

**Name:** Laidlaw Carriers Tank GP, Inc.  
**EPA ID:** MIK918959883

**TRANSPORTER #2**

**Name:** Laidlaw Carriers Bulk GP, Inc.  
**EPA ID:** MIK621327675  
**EPA ID:** NYD980769947

**5. Copies of EPA Acknowledgement of Consent Documents are Included in Attachments 1.**

**6. Annual Reports for 2012:**

**WASTE/SHIPPING INFORMATION:**

**WASTE STREAM #1:**

**Description of Waste:** Waste Refractory Brick  
**EPA Waste Code:** D007 D011

**DOT Shipping Name:** Waste Corrosive Solids, N.O.S. (Sodium compounds),  
Class 8, PG III, (D007, D011)

**DOT Hazard Class:** "8"

**DOT ID Code (UN.NA):** UN1759

**Number of Shipments during the calendar year 2012:** 1

**Total Volume of this Waste Shipped:** 18.8 tons

**WASTE MINIMAZATION ACTIVITIES (Attachment 2)**

☐ Not Required  
☐ Submitted with EPA Biennial Report  
☒ Attached

**CERTIFICATION**

I certify, under penalty of law, that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware there are possible penalties for submitting false information including the possibility of fine and imprisonment.

**Signed:**  **Date:** 2/22/13

## **Attachment 1:**

**Copy of EPA Acknowledgement of Consent  
Documents for Refractory Brick sent to the  
Brunswick Smelter**



UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
ENFORCEMENT AND COMPLIANCE  
ASSURANCE

January 11, 2012

JAY A. HULL  
ROCHESTER SILVER WORKS LLC  
100 LATONA ROAD, EASTMAN BUSINESS PARK BUILDING 110  
ROCHESTER, NY US 14652

EPA Notice ID: 003712/11E/11

Dear JAY A. HULL:

This is to acknowledge receipt of your notice, which was received by EPA on November 4, 2011, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste as specified in your notice:

Waste Stream 1: REFRACTORY BRICK FROM SMELTER  
Waste Description: REFRACTORY BRICK FROM SMELTER  
EPA Waste Code: D007, D011  
DOT Shipping Name: Corrosive solids, n.o.s.  
DOT Hazard Class: 8  
DOT I.D. No. UN1759  
Total Volume to be Exported: 100 US Tons - (2,000 pounds)  
Estimated Frequency: 6 loads Annually



You may ship this waste to the following receiving facility/foreign importer:

XSTRATA CANADA CORPORATION BRUNSWICK SMELTER  
692 MAIN STREET,  
BELLEDUNE, NB, CA

Shipments may occur during the period from January 11, 2012, to January 11, 2013.

Please be advised of the following special RCRA requirements for export shipments of hazardous waste. These requirements are found at Title 40 Code of Federal Regulations, Part 262, Subpart E - Exports of Hazardous Waste.

1. If the major terms of the original notice should change, you must renotify EPA. Please send your renotification to: Environmental Protection Agency, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington D.C. 20460, "Attention: Notification to Export" prominently displayed on the front of the envelope. (§262.53(e))
2. The hazardous waste manifest for each shipment must identify the point of departure from the United States in Item 16. (§262.54(e))
3. A copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste. (§262.54(h))
4. You must provide the transporter with an additional copy of the manifest for delivery to the U.S. Customs official at the point the hazardous waste leaves the United States in accordance with §263.20(g)(4). (§262.54(i))
5. You must file an exception report with the Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Environmental Protection Agency, Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460, if you have not received a copy of the manifest signed by the transporter stating the date and place of departure from the U.S. within forty-five (45) days from the date it was accepted by the initial transporter; if within ninety (90) days from the date the waste was accepted by the initial transporter, the primary exporter has not received written confirmation from the consignee that the hazardous waste was received; and the waste is returned to the United States. (§262.55)



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6. You must file an annual report by March 1 of each year with the Environmental Protection Agency, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460. (§262.56)

All shipments of hazardous waste must conform to all applicable state and federal hazardous waste regulations and transportation requirements, as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Tyria Nesmith, EPA, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), telephone number 202-564-4369, fax number , [nesmith.tyria@epa.gov](mailto:nesmith.tyria@epa.gov).

Sincerely,

  
  
Robert G. Heiss, Director  
International Compliance Assurance Division  
Office of Federal Activities

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## **Attachment 2:**

### **Certification for Waste Minimization Activities\***

\*As Required by The New York State Solid and Hazardous Waste Law §27-0908, an Annual Hazardous Waste Reduction Plan (HWRP) is submitted annually by July 1<sup>st</sup> of each year.

The HWRP for Rochester Silver Works will be submitted for calendar year 2012 (January 1, 2012 – December 31, 2012) by July 1, 2013 to the New York State Department of Environmental Conservation, Division of Solid and Hazardous Materials - Bureau of Hazardous Waste Regulation.

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From: (585) 295-7702  
 Ari Cheremeteff  
 OBrien & Gere  
 400 ANDREWS ST STE 710

Origin ID: KCCA



ROCHESTER, NY 14604

Ship Date: 21FEB13  
 ActWgt: 1.0 LB  
 CAD: 102146596/INET3370

Delivery Address Bar Code



Ref # 48955.400.001  
 Invoice #  
 PO #  
 Dept #

SHIP TO: (585) 295-7700

BILL SENDER

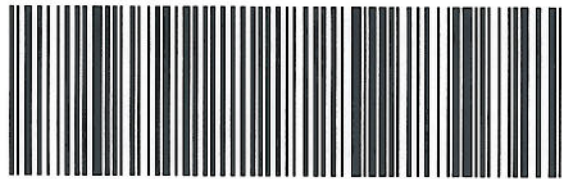
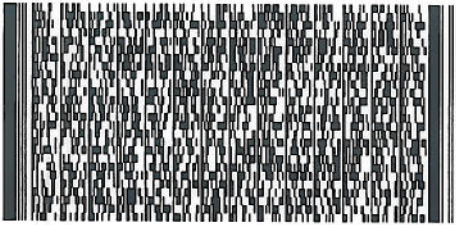
RCRA Enforcement Division (OS-520)  
 Office of Waste Programs Enforcemen  
 US EPAgency-Ariel Rios B(5101)  
 1200 Pennsylvania Avenue, N.W.  
 WASHINGTON, DC 20004

FRI - 22 FEB A1  
 STANDARD OVERNIGHT

TRK# 7948 0841 6039  
 0201

**XC RDVA**

20004  
 DC-US  
 DCA



518G1/DF2493AB

**After printing this label:**

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning:** Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on [fedex.com](http://fedex.com). FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

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